

LOWELL DECL. EX. 12

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

- - -
SHABTAI SCOTT SHATSKY,) Case No. 18-Civ. 12355
individually and as)
personal representative)
of the Estate of Keren) VIRTUAL VIDEOTAPED
Shatsky, J ANNE) DEPOSITION OF FARID
SHATSKY, individually) GHANNAM, VOLUME II
and as personal) JULY 30, 2021
representative of the)
Estate of Keren)
Shatsky, TZIPPORA)
SHATSKY SCHWARZ, YOSEPH)
SHATSKY, SARA SHATSKY)
TZIMMERMAN, MIRIAM)
SHATSKY, DAVID RAPHAEL)
SHATSKY, GINETTE LANDO)
THALER, individually)
and as personal)
representative of the)
Estate of Rachel)
Thaler, LEOR THALER,)
ZVI THALER, ISAAC)
THALER, HILLEL
TRATTNER, RONIT
TRATTNER, ARON S.
TRATTNER, SHELLEY
TRATTNER, EFRAT
TRATTNER, HADASSA
DINER, YAEL HILLMAN,
STEVEN BRAUN, CHANA
FRIEDMAN, ILAN
FRIEDMAN, MIRIAM
FRIEDMAN, YEHIEL
FRIEDMAN, ZVI FRIEDMAN,
and BELLA FRIEDMAN,

Plaintiffs,

against

1
2 THE PALESTINE
3 LIBERATION ORGANIZATION
4 and THE PALESTINIAN
5 AUTHORITY (a/k/a "The
6 Palestinian Interim
Self-Government
Authority" and/or "The
Palestinian National
Authority") ,

7 Defendants .
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1 VIRTUAL VIDEOTAPED DEPOSITION OF FARID
2 GHANNAM, VOLUME II, witness herein, called by
3 the Plaintiffs, for examination, taken pursuant
4 to the Federal Rules of Civil Procedure, by and
5 before Kathy D. Landock, a Certified Realtime
6 Reporter and a notary public in and for the
7 Commonwealth of Pennsylvania, held remotely
8 with all parties appearing from their
9 respective locations, on Friday, July 30, 2021,
10 at 1133 UTC time.

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1 COUNSEL PRESENT:

2 For the Plaintiffs:

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4 Ronald F. Wick, Esq.
5 (Admitted Pro Hac Vice)
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18 ALSO PRESENT:

19 Corey Wainaina, Videographer
20 Hadeer Al-Amiri, Interpreter
21 Simek Shropshire
22 Mordechai Haller

23 - - -

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1 P R O C E E D I N G S
2 - - -

3 VIDEOGRAPHER: Good morning
4 everyone. We are now on the record.
5 Participants should be aware that this
6 proceeding is being recorded, and as such all
7 conversations held will be recorded unless
8 there is a request and agreement to go off the
9 record.

10 This is the remote video recorded
11 deposition of Farid Ghannam. Today is Friday,
12 July 30, 2021. The time is now 11:33 UTC time.
13 We are here in the matter of Shatsky vs. PLO.

14 My name is Corey Wainaina, remote
15 video technician on behalf of U.S. Legal
16 Support, located at 90 Broad Street, New York,
17 New York. I am not related to any party in
18 this action, nor am I financially interested in
19 the outcome.

20 At this time will the reporter,
21 Kathy Landock, on behalf of U.S. Legal Support,
22 please enter the statement for remote
23 proceedings into the record.

24 COURT REPORTER: The attorneys
25 participating in this deposition acknowledge

1 that I am not physically present in the
2 deposition room and that I will be reporting
3 this deposition remotely.

4 They further acknowledge that in
5 lieu of an oath administered in person, the
6 witness will verbally declare his testimony in
7 this matter is under penalty of perjury.

8 The parties and their counsel
9 consent to this agreement and waive any
10 objections to this manner of reporting. Please
11 indicate your agreement by stating your name
12 and your agreement on the record.

13 MS. VINCZE: This is Eszter
14 Vincze on behalf of Plaintiffs. We agree.

15 MR. BERGER: This is Mitchell
16 Berger of Squire, Patton, Boggs on behalf of
17 the Defendants, and we agree.

18 (The interpreter was duly
19 sworn.)

20 MS. VINCZE: Before we begin,
21 just one housekeeping measure. Since we are
22 here remotely during the COVID-19 pandemic, we
23 would ask that Defendants confirm that pursuant
24 to Rule 30(b) (4) of the Federal Rules of Civil
25 Procedures, today's deposition may be taken by

1 video conference as we are proceeding.

2 Pursuant to Rule 29 the parties also
3 stipulate that Ms. Landock is an appropriate
4 officer before whom this deposition may be
5 taken, even though she is in Pennsylvania and
6 the witness is physically located in Jordan.

7 Do we agree?

8 MR. BERGER: I think that's
9 correct for me. On behalf of the Defendants,
10 this is Mitchell Berger, we agree.

11 MS. VINCZE: So could you
12 please pull up Deposition Exhibit No. 4. Tab
13 9, Exhibit No. 4. Please page to 978.

14 - - -

15 FARID GHANNAM,
16 having been first duly sworn, was examined and
17 testified as follows:

18 - - -

19 E X A M I N A T I O N

20 BY MS. VINCZE:

21 Q. Mr. Ghannam, this document provides
22 February 16, 2002 and Karnei Shomron Settlement
23 near Qalqilya as the place and date of the
24 incident; correct?

25 A. Yes.

1 Q. And February 16, 2002, Karnei
2 Shomron Settlement near Qalqilya was written by
3 the social investigator working for the
4 Martyrs' Families and Injured Care
5 Establishment; correct?

6 A. Correct, he works for the
7 Establishment of the Martyrs and Wounded.

8 Q. February 16, 2002 is the date that
9 Mr. Sadeq Ahed Mahmoud Abdel Hafez died;
10 correct?

11 A. Correct.

12 Q. Mr. Hafez died due to injuries
13 caused by an explosive device; correct?

14 A. According to the report of the
15 social investigator, yes.

16 Q. And you have no reason to believe
17 that the social investigator wasn't being
18 truthful; correct?

19 A. Correct.

20 Q. And the explosive device that killed
21 Mr. Sadeq Ahed Mahmoud Abdel Hafez is the one
22 that detonated himself; correct?

23 A. As the social investigator
24 documented in his report regarding the date and
25 the place of the accident, it is a martyrdom

1 incident near Karnei Shomron Settlement.

2 Q. But what I am asking you is whether
3 the explosive device that killed Mr. Sadeq Ahed
4 Mahmoud Abdel Hafez is one that he detonated
5 himself. And that is correct; right?

6 A. According to the social
7 investigator's report prepared by the social
8 investigator, it stated that it's a martyrdom
9 act.

10 Q. Mr. Ghannam, I am not asking you
11 what the document says for place and date of
12 the incident. I am asking you if it is correct
13 that Mr. Sadeq Ahed Mahmoud Abdel Hafez was the
14 person that detonated the explosive device that
15 killed him. And that has a yes or no answer.

16 A. Yes.

17 Q. And the explosive device that killed
18 Mr. Sadeq Ahed Mahmoud Abdel Hafez killed other
19 people, too; correct?

20 A. According to the report of this
21 social investigator, yes.

22 Q. You have no reason to believe that
23 the social investigator was being untruthful
24 when he said that; correct?

25 A. Yes.

1 Q. When the social investigator
2 completed this report, he relied on this
3 information; correct?

4 A. Yes.

5 Q. Further, when the Martyrs' Families
6 and Injured Care Establishment designated
7 Mr. Sadeq Ahed Mahmoud Abdel Hafez, it also
8 relied on this information; correct?

9 Withdrawn.

10 When The Martyrs' Families and
11 Injured Care Establishment designated Mr. Sadeq
12 Ahed Mahmoud Abdel Hafez as a martyr, it also
13 relied on this information; correct?

14 A. Yes.

15 Q. That is why the confirmation --
16 pardon me. Can we page to JD 981 -- pardon me,
17 980.

18 There is text on this page stating
19 he is to be confirmed as a martyr as of March
20 1, 2002 and be paid 600 shekels a month;
21 correct?

22 A. Yes.

23 Q. And the person who wrote that was
24 the Director General of the Martyrs' Families
25 and Injured Care Establishment; correct?

1 A. The general director depended on the
2 recommendation of the director of the
3 department and allowed this statement.

4 Q. Did the Director General write the
5 statement that he is to be confirmed as a
6 martyr of the Al-Aqsa Martyrs as of March 1,
7 2002 and be paid 600 shekels a month?

8 A. Yes.

9 Q. What is an Al-Aqsa martyr?

10 A. Pursuant to the law from the
11 Establishment of the Martyrs and Wounded
12 Families Affairs defined a martyr as a person
13 who lost his life at a specialty age as a
14 result of the act of the occupation or as a
15 result of the act of defending the occupation
16 or as a military consequence of the occupation,
17 or the detainees who died in prison or who died
18 a year after the release from prison, or the
19 wounded who died within three years of his
20 injuries as a result of the injuries.

21 Q. Have you completed your answer,
22 Mr. Ghannam?

23 A. Yes.

24 Q. Can you please pull up tab 12. We
25 would designate this as Deposition Exhibit

1 No. 5.

2 (Deposition Exhibit No. 5 was
3 marked for identification.)

4 BY MS. VINCZE:

5 Q. This is a document received from
6 Defendants bearing production numbers JD 184
7 through JD 188.

8 Mr. Ghannam, can you see the
9 document?

10 A. Yes.

11 Q. Do you recognize this document?

12 A. Yes.

13 Q. What is it?

14 A. This is a document that is the
15 financial section used for the Establishment of
16 the Wounded and Marters' Families Affairs
17 regarding Abdel-Muti Mohammad Saleh Mohammad
18 Shabaneh.

19 Q. The document states case type,
20 martyr; correct?

21 A. Yes.

22 Q. That means the Martyrs' Families and
23 Injured Care Establishment designated
24 Mr. Abdel-Muti Mohammad Saleh Mohammad Sabaneh
25 as a martyr; correct?

1 A. Yes.

2 Q. Under beneficiaries data, it
3 provides the name Rahma Mustafa Abd Al-Mun'im
4 Shabaneh; correct?

5 A. Yes.

6 Q. If you could please page to JD 188.

7 Mr. Ghannam, is it fair to say this
8 shows that Rahma Mustafa Abd Al-Mun'im Shabaneh
9 has received a monthly payment from April 2020
10 through April 1, 2021 as the beneficiary of
11 Abdel-Muti Mohammad Saleh Mohammad Shabaneh?

12 A. Yes.

13 Q. And she has received a monthly
14 stipend -- withdraw.

15 And she has received a monthly
16 payment of 1,400 shekels; correct?

17 A. Yes.

18 Q. And these are payments made to Rahma
19 Mustafa Abd Al-Mun'im Shabaneh because
20 Abdel-Muti Mohammad Saleh Mohammad Shabaneh has
21 been designated as a martyr; correct?

22 A. Yes.

23 Q. Could you please pull up tab 13. We
24 would designate this as Deposition Exhibit
25 No. 6.

(Deposition Exhibit No. 6 was
marked for identification.)

3 BY MS. VINCZE:

4 Q. This is a document we received from
5 Defendants with production numbers 596 -- JD
6 596 through JD 602.

7 Mr. Ghannam, can you see the
8 document?

9 | A. Yes.

Q. What is it?

11 A. It's a social investigation
12 regarding martyr.

13 Q. This is a social investigative
14 report prepared for the case of Abdel-Muti
15 Mohammad Saleh Mohamad Shabaneh; correct?

16 A. Yes.

17 Q. That is the same person who we
18 discussed when we were speaking about Exhibit
19 No. 5; correct?

20 A. Yes.

21 Q. And it says Case: Martyr of Al-Aqsa
22 Intifada; correct?

23 A. Yes.

24 Q. Let's turn to JD 597, please. This
25 document has a section called beneficiary's

1 full name; correct?

2 A. Yes.

3 Q. And the name provided is Rahma
4 Mustafa Abd Al-Mun'im Shabaneh; correct?

5 A. Yes.

6 Q. Beneath that it says mother's full
7 name; correct?

8 A. Yes.

9 Q. And the name provided is Rahma
10 Mustafa Abd Al-Mun'im Shabaneh; correct?

11 A. Yes.

12 Q. So Rahma Mustafa Abd Al-Mun'im
13 Shabaneh is the mother of Abdel-Muti Mohammad
14 Saleh Mohammad Shabaneh; correct?

15 A. Yes.

16 Q. And this is the same Rahma Mustafa
17 Abd Al-Mun'im Shabaneh who, according to --
18 withdrawn.

19 So Rahma Mustafa Abd Al-Mun'im
20 Shabaneh -- withdrawn.

21 This is the same Rahma Mustafa Abd
22 Al-Mun'im Shabaneh that has received payments
23 from April 2020 through April 2021 as the
24 beneficiary of Abdel-Muti Mohammad Saleh
25 Mohammad Shabaneh; correct?

1 A. Yes.

2 Q. And further down the page it says
3 place and date of the incident; correct?

4 A. Yes.

5 Q. And the place and date of the
6 incident provided is July 11, 2003, Jeruselam
7 Mahne Yehuda Street; correct?

8 A. It's June 11, 2003.

9 Q. So the place and date of the
10 incident is June 11, 2003, Jerusalem Mahne
11 Yehuda Street; correct?

12 A. Yes.

13 Q. And that was written by the social
14 investigator employed by the Martyrs' Families
15 and Injured Care Establishment that wrote this
16 report; correct?

17 A. Correct.

18 Q. Beneath that it says details of the
19 incident; correct?

20 A. Yes.

21 Q. The details of the incident are
22 martyrdom operation in the City of Jerusalem,
23 Mahne Yehuda Street, which caused the death of
24 17 Israelis and injured nearly 100; correct?

25 A. Yes.

1 Q. And that also was written by the
2 social investigator employed by the Martyrs'
3 Families and Injured Care Establishment that
4 wrote this report; correct?

5 A. Yes.

6 Q. Mr. Abdel-Muti Mohammad Saleh
7 Mohammad Shabaneh died in that martyr
8 operation; correct?

9 A. Yes.

10 Q. He died because he -- withdrawn.

11 He died due to injuries caused by
12 the detonation of an explosive device; correct?

13 A. Correct.

14 Q. And that explosive device was one
15 that he detonated himself; correct?

16 A. According to the report of the
17 social investigator, yes.

18 Q. And you have no reason to believe
19 that the social investigator wasn't being
20 truthful when he wrote that; correct?

21 A. Yes.

22 Q. And the explosive device that
23 Mr. Abdel-Muti Mohammad Saleh Mohammad Shabaneh
24 detonated killed others, too; correct?

25 MR. BERGER: Objection, asked

1 and answered.

2 BY MS. VINCZE:

3 Q. Mr. Ghannam, you may respond.

4 A. According to what is written in the
5 social investigator's report, yes.

6 Q. And you have no reason to believe
7 that the social investigator wasn't being
8 truthful when he wrote this report; correct?

9 MR. BERGER: Objection, asked
10 and answered. You may answer again.

11 THE WITNESS: Yes.

12 BY MS. VINCZE:

13 Q. And the explosive device of
14 Mr. Abdel-Muti Mohammad Saleh Mohammad Shabaneh
15 also injured other people; correct?

16 MR. BERGER: Objection, asked
17 and answered. You may answer again.

18 THE WITNESS: According to the
19 report of the social investigator, yes.

20 BY MS. VINCZE:

21 Q. And you have no reason to believe
22 that when the social investigator wrote that
23 this martyrdom operation injured nearly 100 he
24 was not being truthful; correct?

25 MR. BERGER: Objection, asked

1 and answered. You may answer again.

2 THE WITNESS: Yes.

3 BY MS. VINCZE:

4 Q. And it was the bombing of --
5 withdrawn.

6 And it was the details of the
7 incident -- withdrawn.

8 And it was this incident on June 11,
9 2003 that caused Mr. Abdel-Muti Mohammad Saleh
10 Mohammad Shabaneh to be designated as a martyr;
11 correct?

12 A. Yes.

13 Q. Let's turn to JD 599. There is a
14 section of this called recommendation of the
15 department; right?

16 A. Yes.

17 Q. It states he was martyred as a
18 result of a bomb attack in Jerusalem, Ishadi;
19 correct?

20 A. Yes.

21 Q. And it says to be confirmed as a
22 martyr of the Al-Aqsa Intifada; correct?

23 A. Yes.

24 Q. This is a recommendation that
25 because Mr. Abdel-Muti Mohammad Saleh Mohammad

1 Shabaneh is designated as a martyr, his mother
2 received monthly payments; correct?

3 A. It was social need, especially that
4 the house that the mother of the martyr was
5 living in was destroyed by the occupation -- by
6 the Israeli occupation forces.

7 Q. But if Mr. Abdel-Muti Mohammad Saleh
8 Mohammad Shabaneh had not been designated a
9 martyr, then his mother would not be receiving
10 these payments; correct?

11 A. Pursuant to the law, yes.

12 Ms. VINCZE: This is for the
13 court reporter, I believe it's pursuant to the
14 law.

15 MR. BERGER: I think it's
16 still missing a word. Pursuant to the law,
17 yes.

18 (Discussion held off the
19 record.)

20 BY MS. VINCZE:

21 Q. Mr. Ghannam, there is a section of
22 this called confirmation of the Director
23 General; correct?

24 A. Yes.

25 Q. That states confirmed as a martyr of

1 the Al-Aqsa Intifada as of June 1, 2003;
2 correct?

3 A. Yes.

4 Q. And it says, will be paid some
5 blacked out text shekels a month; correct?

6 A. Yes.

7 Q. What text has been blacked out?

8 A. This is an amount that was changed
9 or modified according to the living standard.
10 As I mentioned in the previous session that
11 there is some modification that happens
12 according to the change in the living standards
13 in Palestine.

14 MS. VINCZE: Mr. Berger, does
15 Mr. Ghannam have unredacted documents
16 available?

17 MR. BERGER: He has them
18 available if needed.

19 MS. VINCZE: I believe they
20 are needed.

21 MR. BERGER: Why are they
22 needed? I think he is giving you answers as to
23 what is there.

24 MS. VINCZE: No, he has not
25 told me what is there. He has explained

1 probably what might be there.

2 MR. BERGER: I'll make a
3 representation to you given the limited amount
4 of time we have that it is pre-April 2020
5 payment amounts. And since payment information
6 is relevant only after April 18, 2020 it was
7 redacted.

8 MS. VINCZE: We will take this
9 up later because I'm not inclined to spend a
10 lot of time on it now, but I will note similar
11 information has not been redacted in other
12 documents.

13 BY MS. VINCZE:

14 Q. Mr. Ghannam, it was the Director
15 General that wrote, confirmed as a martyr of
16 the Al-Aqsa Intifada as of June 1, 2003 and
17 will be paid some unknown amount shekels a
18 month; correct?

19 A. Yes.

20 Q. When he confirms Mr. Abdel-Muti
21 Mohammad Saleh Mohammad Shabaneh, he was
22 relying on the information contained in the
23 social investigative report; correct?

24 Q. That includes the information
25 provided on JD 597; correct?

1 A. Yes.

2 Q. There's no reason to believe that
3 the information in this social investigative
4 report is not accurate; correct?

5 A. Yes.

6 Q. Can you please pull up tab 10. We
7 would like to designate this as Deposition
8 Exhibit No. 7.

9 (Deposition Exhibit No. 7 was
10 marked for identification.)

11 BY MS. VINCZE:

12 Q. This is a document produced to us by
13 Defendants bearing production numbers JD 194
14 through JD 198.

15 Mr. Ghannam, can you see this
16 document?

17 A. Yes.

18 Q. What is it?

19 A. This is a document produced from the
20 Establishment of the Wounded and Martyrs'
21 Families Affairs regarding the martyr, Ramiz
22 Fahmi Izz al-Din Aslam. It's regarding the
23 financial information.

24 Q. This document says case type,
25 martyr; correct?

1 A. Yes.

2 Q. That means that Mr. Ramiz Fahmi Izz
3 al-Din Aslam has been designated as a martyr by
4 the Martyrs' Families and Injured Care
5 Establishment; correct?

6 A. Correct, yes.

7 Q. And there's a section called
8 beneficiary's data; correct?

9 A. Yes.

10 Q. And the name provided under that
11 section is Ghalia Zaki Abd Al-Hamid Abu Salim;
12 correct?

13 A. Yes.

14 Q. Let's please page to JD 198.
15 Mr. Ghannam, is it fair to say this shows that
16 Ghalia Zaki Abd Al-Hamid Abu Salim has been
17 receiving monthly payments from April 2020
18 through April 1, 2021?

19 A. Yes.

20 Q. And she has been receiving those
21 payments as the beneficiary of Ramiz Fahmi Izz
22 al-Din Aslam; correct?

23 A. Yes.

24 Q. These are monthly payments of 1,400
25 shekels; correct?

1 A. Yes.

2 Q. She is receiving these payments
3 because the Martyrs' Families and Injured Care
4 Establishment has designated Ramiz Fahmi Izz
5 al-Din Aslam as a martyr; correct?

6 A. Yes.

7 Q. Let's please pull up tab 11.

8 Mr. Ghannam, can you see the document?

9 A. Yes.

10 Q. What is it? Withdrawn.

11 Do you recognize it?

12 A. Yes.

13 Q. What is it?

14 A. This is a social investigation
15 document produced from the Establishment of the
16 Wounded and Martyrs Family Affairs regarding
17 the martyr Ramiz Fahmi Izz al-Din Aslam.

18 Q. This is the same Ramiz Fahmi Izz
19 al-Din Aslam that we discussed previously with
20 respect to Exhibit No. 7; correct?

21 A. Yes.

22 Q. We would like to designate this as
23 Deposition Exhibit No. 8.

24 (Deposition Exhibit No. 8 was
25 marked for identification.)

1 BY MS. VINCZE:

2 Q. Can you please page to JD 614.

3 There's a section called beneficiary's full
4 name; correct?

5 A. Yes.

6 Q. And the name provided is Ghalia Zaki
7 Abd Al-Hamid Abu Salim; correct?

8 A. Yes.

9 Q. And beneath that there's a section
10 called mother's full name; correct?

11 A. Yes.

12 Q. And the name provided there is
13 Ghalia Zaki Abd Al-Hamid Abu Salim; correct?

14 A. Yes.

15 Q. So Ghalia Zaki Abd AlHamid Abu Salim
16 is the mother of Ramiz Fahmi Izz al-Din Aslam;
17 correct?

18 A. Yes.

19 Q. This is the same Ghalia Zaki Abd
20 Al-Hamid Abu Salim who has been receiving
21 monthly payments as the beneficiary of Ramiz
22 Fahmi Izz al-Din Aslam; correct?

23 A. Yes.

24 Q. And there is a section called place
25 and date of the incident; correct?

1 A. Yes.

2 Q. The information provided there is
3 September 9, 2003, Jerusalem; correct?

4 A. Yes.

5 Q. That information was provided by the
6 investigator that completed this report for the
7 Martyrs' Families and Injured Care
8 Establishment; correct?

9 A. Yes.

10 Q. There's a section beneath that that
11 says details of the incident; correct?

12 A. Yes.

13 Q. The information provided there is,
14 the martyr used an explosive belt which he wore
15 wore on his body to perpetrate the martyrdom
16 attack on a coffee shop in the City of
17 Jerusalem. The attack took place shortly
18 before midnight Tuesday, when the coffee shop
19 was filled with Zionists. Seven Zionists were
20 killed and dozens were wounded as a result;
21 correct?

22 A. Yes.

23 Q. That information was also provided
24 by the social investigator that completed this
25 report on behalf of the Martyrs' Families and

1 Injured Care Establishment; correct?

2 A. Yes.

3 Q. And you have no reason to doubt the
4 accuracy of that statement, do you?

5 A. Yes.

6 Q. When the Martyrs' Families and
7 Injured Care Establishment designated Ramiz
8 Fahmi -- pardon me. Withdrawn.

9 When the Martyrs' Families and
10 Injured Care Establishment designated Ramiz
11 Fahmi Izz al-Din Aslam as a martyr, it relied
12 upon the details provided in this statement;
13 correct?

14 A. Correct.

15 Q. Let's turn to JD 166. There is a
16 section called recommendation of the
17 department; correct?

18 A. Yes.

19 Q. Beneath that it states a martyr of
20 the Al-Aqsa Intifada, single. His parents are
21 alive. Became a martyr as a result of his
22 martyrdom operation in Jerusalem, therefore we
23 recommend that you confirm his status as a
24 martyr of the Al-Aqsa Intifada in accordance
25 with the regulations; correct?

1 A. Yes.

2 Q. The martyrdom operation referred to
3 in this statement is the incident described on
4 JD 614; correct?

5 A. Yes.

6 Q. And there is a section beneath that
7 that provides confirmation of the Director
8 General; correct?

9 A. Yes.

10 Q. Beneath that section it states
11 confirmed as a martyr of the Al-Aqsa Intifada
12 as of September 1, 2003. Will be paid 600
13 shekels a month; correct?

14 A. Yes.

15 Q. When confirming Mr. Ramiz Fahmi Izz
16 al-Din Aslam as a martyr, the Director General
17 relied on the information in the social
18 investigative report; correct?

19 A. He depended on the information
20 present in the social investigator's report and
21 the recommendation from the director of the
22 department.

23 Q. To clarify, is that the
24 recommendation on the top of this page?

25 A. Yes.

1 MS. VINCZE: Let's go off the
2 record and take a five-minute comfort break.

3 VIDEOGRAPHER: We are now off
4 the record. The time is 12:40 UTC time.
5 - - -

6 (Whereupon, a short recess was
7 taken off the record.)
8 - - -

9 VIDEOGRAPHER: We are back on
10 the record. The time is 12:55 UTC time.

11 BY MS. VINCZE:

12 Q. Can I ask you to please pull up tab
13 16. We would like to -- this is defense
14 exhibit -- pardon, I didn't mean to say that.

15 This is Deposition Exhibit No. 9 I
16 believe.

17 (Deposition Exhibit No. 9 was
18 marked for identification.)

19 BY MS. VINCZE:

20 Q. This is a document we received from
21 Defendants. It bears production numbers 689
22 through 698.

23 Actually, can you please scroll up a
24 bit. I think we've got the wrong document.

25 Can you pull up tab 17, please. Can

1 you quickly scroll up to the translation. Can
2 you scroll back down to the original. So we
3 would like to designate this as Exhibit No. 10.
4 This is a document produced by Defendants
5 bearing production numbers JD 225 through JD
6 228.

7 (Deposition Exhibit No. 10 was
8 marked for identification.)

9 BY MS. VINCZE:

10 Q. Mr. Ghannam, can you see the
11 document?

12 A. Yes.

13 Q. Do you recognize the document?

14 A. Yes.

15 Q. What is it?

16 A. This is a document used from the
17 Establishment of the Wounded and Martyrs'
18 Family Affairs regarding Abdel Rahman Idris
19 Muhammad al-Shaludi. It concerns the financial
20 section.

21 Q. The document states case type,
22 martyr; correct?

23 A. Yes.

24 Q. That means the Martyrs' Families and
25 Injured Care Establishment has designated Abdel

1 Rahman Idris Muhammad al-Shaludi as a martyr;
2 correct?

3 A. Yes.

4 Q. And there's a section called
5 beneficiary's data; correct?

6 A. Yes.

7 Q. And the name provided in that
8 section is Idris Muhammad Yahya al-Shaludi;
9 correct?

10 A. Yes.

11 Q. Can we please page down to JD 228.

12 Mr. Ghannam, is it fair to say this
13 shows that Idris Muhammad Yahya al-Shaludi has
14 been receiving monthly payments from April 2020
15 through April 2021?

16 A. Yes.

17 Q. These are payments he is receiving
18 as the beneficiary of Abdel Rahman Idris
19 Muhammad al-Shaludi; correct?

20 A. Yes.

21 Q. And these are payments wired to
22 Idris Muhammad Yahya al-Shaludi from funds
23 under the control of the Palestinian Authority;
24 correct?

25 MR. BERGER: Objection to the

1 form, lacks foundation.

2 BY MS. VINCZE:

3 Q. You may answer, Mr. Ghannam.

4 A. Yes.

5 Q. So these are payments paid to Idris
6 Muhammad Yahya al-Shaludi from funds under the
7 control of the PA; correct?

8 A. Yes.

9 Q. These are paid using the banking
10 information provided on JD 225; correct?

11 A. Yes.

12 Q. Can you please pull up Exhibit
13 No. 10 -- sorry, Exhibit No. 9, which is the
14 document we accidentally pulled up previously.

15 Mr. Ghannam, do you recognize this
16 document?

17 A. Yes.

18 Q. What is it?

19 A. It's a document regarding social
20 investigation for Abdel Rahman Idris Muhammad
21 al-Shaludi produced from the Establishment of
22 the Wounded and Martyrs' Family Affairs.

23 Q. At the top of this document it says
24 Palestine Liberation Organization, does it not?

25 A. Yes.

1 Q. That is because the social
2 investigator working on this report was working
3 for the Palestine Liberation Organization;
4 correct?

5 A. He was working for the Establishment
6 of the Wounded and Martyrs' family Affairs, and
7 as I mentioned previously, the Establishment of
8 the Wounded and Martyrs' Family Affairs was
9 part of the institution of PLO.

10 Q. Let's turn to -- withdrawn.

11 Let's turn to JD 690, please. Under
12 case's name the name provided is Abdel Rahman
13 al-Shaludy; correct?

14 A. Yes.

15 Q. In the middle of the page there's a
16 section called administrative information;
17 correct?

18 A. Yes.

19 Q. And it provides a military rank of
20 combatant; correct?

21 A. Yes.

22 Q. That is because Mr. Abdel Rahman
23 al-Shaludy was a member of Al-Aqsa; correct?

24 A. Can you repeat the question again,
25 please.

1 Q. That is because Mr. Abdel Rahman
2 Idris Muhammadal-Shaludy was a member of
3 Al-Aqsa; correct?

4 A. Yes.

5 Q. And beneath that there's a section
6 called place and date of the incident; correct?

7 A. Yes.

8 Q. The place and date provided is
9 October 22, 2014, French Hill; correct?

10 A. Yes.

11 Q. And beneath that section there's a
12 section called details of the incident;
13 correct?

14 A. Correct.

15 Q. And the details of the incident
16 provided are: He became a martyr, may Allah
17 have mercy upon him, when he executed a
18 vehicular attack against a group of settlers in
19 the City of Jerusalem, French Hill. The attack
20 claimed the lives of two settlers and injured
21 six others. As a result, one of the settlers
22 opened fire immediately after he got out of his
23 car, and so he was martyred on the spot;
24 correct?

25 A. Yes.

1 Q. That statement was written by the
2 social investigator working for the Martyrs'
3 Families and Injured Care Establishment that
4 wrote this report; correct?

5 A. From the investigator that was for
6 the Establishment of the Wounded and Martyrs
7 Family Affairs, yes.

8 Q. And you have no reason to doubt the
9 accuracy of that statement, do you?

10 A. Yes.

11 Q. Let's turn to JD 691. This page
12 contains a family table; correct?

13 A. Yes.

14 Q. And in the first row of that table
15 it says Idris Muhammad Yahya al-Shaludi,
16 father; correct?

17 A. Yes.

18 Q. That is because Idris Muhammad Yahya
19 al-Shaludi is the father of Abdel Rahman Idris
20 Muhammad al-Shaludi; correct?

21 A. Yes.

22 Q. This is the same Idris Muhammad
23 Yahya al-Shaludi that has been receiving
24 monthly payments as the beneficiary of Abdel
25 Rahman Idris Muhammad al-Shaludi; correct?

1 A. Yes.

2 Q. Because the Abdel Rahman Idris
3 Muhammad al-Shaludi referred to in these
4 documents is the same person as the Abdel
5 Rahman Idris Muhammad al-Shaludi referred to in
6 the exhibit we previously discussed; correct?

7 A. Yes.

8 Q. Let's turn to page 692. The top of
9 the page reads recommendation of the
10 department; correct?

11 A. Yes.

12 Q. Beneath that it states the case
13 should be confirmed according to the
14 recommendations and the necessary steps, as the
15 martyr's parents are alive; correct?

16 A. Yes.

17 Q. That was written by the social
18 investigator that filled out this report;
19 correct?

20 A. Yes.

21 Q. And the martyr that statement refers
22 to is Abdel Rahman Idris Muhammad al-Shaludi;
23 correct?

24 A. Yes.

25 Q. When determining that Abdel Rahman

1 Idris Muhammad al-Shaludi is a martyr, the
2 social investigator relied on the details of
3 the incident provided on page JD 690; correct?

4 A. Yes.

5 Q. Beneath that it states decision of
6 the Establishment's director; correct?

7 A. Yes.

8 Q. And beneath that it states, I
9 recommend that the case will be confirmed as a
10 martyr of Al-Aqsa Martyrs as of the date of his
11 martyrdom, and the president's honorary payment
12 will be added to his first allowance.

13 INTERPRETER: It's not on the
14 screen.

15 Q. Can you please page down to 692. I
16 withdraw the question.

17 Beneath the decision of the
18 Establishment's director it states, I recommend
19 that the case will be confirmed as a martyr of
20 Al-Aqsa Martyrs as of the date of his
21 martyrdom, and the president's honorary payment
22 will be added to his first allowance. The
23 beneficiary of the payment is his father, Idris
24 Muhammad Yahya al-Shaludi, ID No. [REDACTED] 7395, and
25 the number, and there's a redacted number. Is

1 that right?

2 A. Yes.

3 Q. The date of the martyrdom is October
4 22, 2014; correct?

5 A. Yes.

6 Q. Because that is the date of the
7 incident described in details of the incident;
8 correct?

9 A. Yes.

10 Q. The incidents that occurred that day
11 are what made Mr. Abdel Rahman Idris Muhammad
12 al-Shaludi a martyr for purposes of the
13 Martyrs' Families and Injured Care
14 Establishment; correct?

15 A. That's according to the law of the
16 Establishment of the Wounded Martyrs' Family
17 Affairs, yes.

18 Q. And the incidents as described in JD
19 690 are the ones considered by the Martyrs'
20 Families and Injured Care Establishment when it
21 determined that Mr. Abdel Rahman Idris Muhammad
22 al-Shaludi was a martyr under the law you
23 referenced; correct?

24 A. Yes.

25 Q. When was the determination made that

1 Abdel Rahman Idris Muhammad al-Shaludi was a
2 martyr?

3 A. Mr. Abdel Rahman Idris Muhammad
4 al-Shaludi was considered as a martyr according
5 to the report on November 1, 2015.

6 Q. Wasn't that before the law was
7 passed that you referred to as the law
8 governing taking care of the Martyrs' Families
9 and Wounded in 2016?

10 A. Yes, and it was the incident on
11 November 1, 2015.

12 Q. I'm sorry, Mr. Ghannam, I just don't
13 understand. I believe you referred to a law
14 dated 2016. Is that right?

15 A. Yes.

16 Q. Further down this page there's a
17 section called confirmation of the Director
18 General; correct?

19 A. Yes.

20 Q. This reads, he is confirmed as a
21 martyr of the Al-Aqsa Intifada as of November
22 1, 2015, and will receive a martyr payment of
23 1,700 shekels a month according to the
24 regulations in addition to a president's
25 honorary payment of 6,000 shekels which will be

1 added to first allowance; correct?

2 A. Yes.

3 Q. What is the president's honorary
4 payment?

5 A. According to the financial rules and
6 regulations, that is used from the
7 Establishment of the Wounded and Martyrs Family
8 Affairs, one time sent from the General
9 Director as based after reading the information
10 and after following the rules pursuant to the
11 law for 2016, Section 3, that the Director
12 General can dispense a one-time incentive of
13 6,000 shekels -- a one-time allowance of 6,000
14 shekels pursuant to the law.

15 MR. BALOUL: We have an
16 objection to the translation. It's not the
17 general director, it's the president.

18 MS. VINCZE: Is that right,
19 Mr. Interpreter?

20 INTERPRETER: That's correct,
21 it's the president.

22 MR. BALOUL: Another
23 objection. The word incentive was not used. I
24 know that this was a long answer, so we have to
25 do it one of two ways, interpreter. One way we

1 can have you say sentence by sentence and you
2 write it down all to translate it accurately,
3 because we're putting words that are simply
4 inaccurate.

5 INTERPRETER: If he wants to
6 read it sentence by sentence --

7 MR. BALOUL: We will do that.

8 MS. VINCZE: No, no, I will
9 reask the question, and then Mr. Ghannam will
10 respond, and we will slow down the translation.

11 MR. BALOUL: That works.
12 Proceed.

13 BY MS. VINCZE:

14 Q. What is the president's honorary
15 payment?

16 A. According to the -- the payment is
17 according to the rules and financial
18 regulations that is present and the law that
19 governs the Establishment of the Wounded and
20 Martyrs Family Affairs.

21 A one-time honorary payment
22 dispensed from the president after documenting
23 the incident and the economic situation of the
24 family for one time only.

25 And this payment is for the purpose

1 of paying the expenses of the burial of the
2 martyr.

3 Q. Is that the complete answer?

4 A. Yes.

5 Q. Only martyrs qualify for this
6 payment; correct?

7 A. The family of the martyr, the family
8 of the martyr is the one who qualifies for this
9 payment pursuant to the law and before the
10 financial regulations.

11 Also this honorary payment is
12 dispensed to the employee who dies, and this
13 amount is around 5,000 shekels, it's dispensed
14 for one time only.

15 Q. This was a payment of 6,000 shekels;
16 correct?

17 A. Yes.

18 Q. So this payment was made because
19 Mr. Abdel Rahman Idris Muhammad al-Shaludi was
20 designated as a martyr; correct?

21 A. Pursuant to the law the payment was
22 made for him.

23 Q. To clarify, the payment would not
24 have been made if he had not been designated a
25 martyr; correct?

1 A. Yes.

2 Q. When you refer to the law, you refer
3 to the law dated 2016?

4 A. Yes.

5 Q. But the date this payment was
6 authorized was in February 2015, no?
7 Withdrawn.

8 This payment was authorized in 2015;
9 correct?

10 A. As I mentioned previously in my
11 response, there was financial regulations that
12 govern the institution or the establishment
13 since it was established, and these divisions
14 were part -- then became part of the law, the
15 Palestinian law, as a division in that law.

16 Q. Mr. Ghannam, I'm just trying to
17 understand your answer. You're saying that
18 there were certain preexisting regulations that
19 were later put into this 2016 law?

20 A. Yes.

21 Q. Are these regulations anywhere in
22 writing?

23 A. I spoke with the Establishment of
24 the Wounded and Martyrs Family Affairs about
25 these regulations. They told me that it's

1 present and they're going to search for it,
2 look for it, search for it and provide it for
3 me when they find it, if they find it within
4 their possession.

5 Q. Does that mean you've never seen
6 them?

7 A. As I mentioned before, I spoke with
8 them and they told me they will look for it.
9 So I didn't see it, I just spoke with them
10 about it.

11 MS. VINCZE: Mr. Berger, when
12 you do receive these documents, we would like
13 them produced.

14 MR. BERGER: Once we see them
15 we'll be happy to review them and let you know
16 our position on that, but I can't see why we
17 wouldn't.

18 BY MS. VINCZE:

19 Q. Can you please pull up tab 14. I
20 would like to designate this as Exhibit No. 11.

21 (Deposition Exhibit No. 11 was
22 marked for identification.)

23 BY MS. VINCZE:

24 Q. These are documents we received from
25 Defendants with Bates numbers -- pardon, with

1 production numbers JD 83 through JD 85.

2 Mr. Ghannam, can you see the
3 document?

4 A. Yes.

5 Q. Do you recognize the document?

6 A. Yes.

7 Q. What is it?

8 A. This document is produced from the
9 Establishment of the Martyrs and Wounded Family
10 Affairs regarding Izz al-Din Shuheil Ahmad
11 al-Masri, it concerns the financial section.

12 Q. Now, this document states case type,
13 martyr; correct?

14 A. Yes.

15 Q. That means the Martyrs' Families and
16 Injured Care Establishment has designated Izz
17 al-Din Shuheil Ahmad al-Masri as a martyr;
18 correct?

19 A. Yes.

20 Q. There is a section beneath that that
21 reads beneficiary's data; correct?

22 A. Yes.

23 Q. And the name provided in that
24 section is Fatma Hamed Isma'il Masri; correct?

25 A. Yes.

1 Q. Can you please page down to JD 87.

2 Mr. Ghannam, is it fair to say this
3 shows that Fatma Hamed Isma'il Masri has been
4 receiving payments on a monthly basis from
5 April 2020 through April 2021?

6 A. Yes.

7 Q. And she receives these payments as
8 the beneficiary of Izz al-Din Shuheil Ahmad
9 al-Masri; correct?

10 A. Yes.

11 Q. These payments are made from funds
12 under the control of the PA; correct?

13 A. Yes.

14 Q. Because all payments made to
15 qualifying beneficiaries of people designated
16 as martyrs are made from funds under the
17 control of the PA; correct?

18 MR. BERGER: Objection,
19 indefinite as to time.

20 BY MS. VINCZE:

21 Q. You may answer, Mr. Ghannam.

22 A. Yes.

23 Q. Thank you.

24 To your understanding, does Fatma
25 Hamed Isma'il Masri continue to receive these

1 payments monthly as of today?

2 A. Yes.

3 Q. Can you please pull up tab 15. We
4 would like to designate this as Exhibit No. 12.

5 (Deposition Exhibit No. 12 was
6 marked for identification.)

7 BY MS. VINCZE:

8 Q. This is a document produced to us
9 from Defendants bearing production numbers JD
10 896 through JD 913.

11 Mr. Ghannam, can you see the
12 document?

13 A. Yes.

14 Q. Do you recognize it?

15 A. Yes.

16 Q. What is it?

17 A. This is a document we use from the
18 Establishment of the Wounded and Martyrs'
19 Family Affairs regarding the renewal of the
20 financial information and the payment pursuant
21 to the law for the martyr Izz al-Din Shuheil
22 Ahmad al-Masri.

23 Q. And that is the same Izz al-Din
24 Shuheil Ahmad al-Masri that we discussed when
25 we were speaking about Exhibit No. 11?

1 A. Yes.

2 Q. At the top of the document it reads
3 Palestinian Liberation Organization; correct?

4 A. Yes.

5 Q. And the document is signed by the
6 General Director of Allowances; correct?

7 A. Yes.

8 Q. Is the General Director of
9 Allowances an employee of the PLO?

10 MR. BERGER: Objection,
11 indefinite as to time. You may answer.

12 THE WITNESS: Yes.

13 BY MS. VINCZE:

14 Q. The document is dated October 20,
15 2020, is it not?

16 A. Correct.

17 Q. So when the General Director of
18 Allowances signed it, he signed it in 2020,
19 didn't he?

20 A. Yes.

21 Q. It says, there's a section called
22 director's opinion; correct?

23 A. Yes.

24 Q. It states, I confirm the -- I can't
25 read the next word. What does it say after

1 director's opinion?

2 A. It says I confirm the recommendation
3 and the payment is renewed for the beneficiary,
4 the mother of the martyr. And she is the
5 beneficiary and she's still living, this is
6 according to the documents attached and
7 pursuant to the law of the establishment.

8 Q. And there's a section below that
9 that states procedure of the Director General;
10 correct?

11 A. Yes.

12 Q. It states, renewal of the
13 confirmation of the payment in accordance with
14 regulations; correct?

15 A. Yes.

16 Q. So the General Director of
17 Allowances is involved in confirming that
18 payments continue to be made to the beneficiary
19 of Izz al-Din Shuheil Ahmad al-Masri; correct?

20 A. Yes.

21 Q. Can you please go to JD 904.

22 Actually, can we go to JD 903.

23 Mr. Ghannam, what is this document?

24 A. It's a social investigation
25 conducted by the Establishment of the Wounded

1 and Martyrs Family Affairs regarding the martyr
2 Izz al-Din Shuheil Ahmad al-Masri.

3 Q. There is handwriting on this
4 document that says president's honorary payment
5 sent by fax August 3, 2018; correct?

6 A. Yes.

7 Q. That means Izz al-Din Shuheil Ahmad
8 al-Masri received the same honorary payment as
9 Mr. Al-Shaludi; correct?

10 A. Yes.

11 Q. The date of this report is August
12 15, 2001; right?

13 A. Yes.

14 Q. So that is the date the social
15 investigative report was made; correct?

16 A. Yes.

17 Q. Please go to JD 904. There is a
18 section on this page starting personal
19 information; correct?

20 A. Yes.

21 Q. And there is a section that reads
22 mother's full name; correct?

23 A. Yes.

24 Q. And the name following that is Fatma
25 Hamed Isma'il Masri; correct?

1 A. Yes.

2 Q. That means Fatma Hamed Isma'il Masri
3 is the mother of Izz al-Din Shuheil Ahmad
4 al-Masri; correct?

5 A. Yes.

6 Q. And this is the same Fatma Hamed
7 Isma'il Masri who has been receiving monthly
8 payments as the beneficiary of Izz al-Din
9 Shuheil Ahmad al-Masri since April 2020;
10 correct?

11 A. Yes.

12 Q. There's a section of this page
13 titled administrative information; correct?

14 A. Yes.

15 Q. And beneath that it says
16 organizational affiliation Hamas; correct?

17 A. Yes.

18 Q. That is because Izz al-Din Shuheil
19 Ahmad al-Masri is a member of Hamas; correct?

20 A. According to the report, yes.

21 Q. And you have no reason to doubt the
22 accuracy of that statement, do you?

23 A. Yes.

24 Q. It states place and date of the
25 incident, August 9, 2001, West Jerusalem Sbarro

1 Restaurant; correct?

2 A. Yes.

3 Q. The person who wrote August 9, 2001,
4 West Jerusalem Sbarro Restaurant was the
5 employee of the Martyrs' Families and Wounded
6 Establishment that filled out this form;
7 correct?

8 A. Yes.

9 Q. And beneath that it says details of
10 the incident; right?

11 A. Yes.

12 Q. Following that it states, became a
13 martyr as a result of a martyrdom operation in
14 West Jerusalem on August 9, 2001; correct?

15 A. Yes.

16 Q. And the person who wrote that
17 statement was the social investigator that
18 filled out this form for the Martyrs' Families
19 and Injured Care Establishment; correct?

20 A. Yes.

21 Q. Izz al-Din Shuheil Ahmad al-Masri
22 died on August 9, 2001; correct?

23 A. Yes.

24 Q. And he died due to injuries caused
25 by an explosive device; correct?

1 A. Yes.

2 Q. And the explosive device that caused
3 his death was one that he detonated himself;
4 correct?

5 A. According to the report, yes.

6 Q. Do you have any reason to doubt the
7 accuracy of that statement?

8 A. No.

9 Q. When Izz al-Din Shuheil Ahmad
10 al-Masri detonated the explosive device on
11 August 9, 2001, he killed others, too; correct?

12 A. According to the report, yes.

13 Q. And you have no reason to think that
14 is inaccurate, do you?

15 A. Yes.

16 Q. The bombing that caused his death
17 and the death of the others is the incident
18 described in details of the incident on JD 904;
19 correct?

20 A. Yes.

21 Q. Let's turn to JD 907, please. Thank
22 you.

23 At the top of this page it reads
24 recommendations of the department; correct?

25 A. Yes.

1 Q. Beneath that it states single. The
2 mother is alive. The martyr has five siblings.
3 We recommend to confirm the above-named martyr
4 as a martyr of Al-Aqsa Intifada; correct?

5 A. Both parents, not only the mother
6 are still living, yes.

7 Q. And it also states we recommend to
8 confirm the above named martyr as a martyr of
9 Al-Aqsa Intifada; correct?

10 A. Yes.

11 Q. The person who wrote that statement
12 is the social investigator who filled out this
13 form on behalf of the Martyrs' Families and
14 Injured Care Establishment; correct?

15 A. Yes.

16 Q. And in determining that Izz al-Din
17 Shuheil Ahmad al-Masri is a martyr, that person
18 relied on the incidence described on JD 904;
19 correct?

20 A. Yes.

21 Q. Because it was the circumstances of
22 Izz al-Din Shuheil Ahmad al-Masri's death that
23 made him a martyr; correct?

24 A. Yes.

25 Q. And beneath that it reads decision

1 of the Establishment's director; correct?

2 A. Yes.

3 Q. And it states to be confirmed as a
4 martyr of the Al-Aqsa Intifada as of August 1,
5 2001?

6 A. Yes.

7 Q. That is because the Martyrs'
8 Families and Injured Care Establishment
9 considered the circumstances of the death of
10 Izz al-Din Shuheil Ahmad al-Masri to be part of
11 the Al-Aqsa Intifada; correct?

12 A. Yes.

13 Q. Let's go to JD 908, please.
14 There is a section of this that
15 reads confirmation of the Director General;
16 correct?

17 A. Yes.

18 Q. Beneath that reads, to be confirmed
19 as a martyr of the Al-Aqsa Martyrs as of August
20 1, 2001, to be paid, and then the number is
21 redacted; correct?

22 A. Yes.

23 Q. That is because Izz al-Din Shuheil
24 Ahmad al-Masri's mother qualified to receive
25 payments due to his designation as a martyr;

1 correct?

2 A. She was eligible for the payment
3 because the divisions of the law to consider
4 him as a martyr applied to her.

5 Q. But the person that filled out this
6 document determined that Izz al-Din Shuheil
7 Ahmad al-Masri qualified as a martyr under that
8 law; correct?

11 THE WITNESS: Pursuant to the
12 law and the social status, yes.

13 BY MS. VINCZE:

14 Q. If Izz al-Din Shuheil Ahmad al-Masri
15 had not been determined to be a martyr by the
16 Martyrs' Families and Injured Care
17 Establishment, then his mother would not
18 qualify to receive payments under this program;
19 correct?

20 MR. BERGER: Objection,
21 hypothetical. You may answer.

THE WITNESS: Pursuant to the
law and the social status of this family.

24 MS. VINCZE: Let's go off the
25 record and take a five-minute comfort break.

1 VIDEOGRAPHER: We are now off
2 the record. The time is 1411 UTC time.
3 - - -
4 (Whereupon, a short recess was
5 taken off the record.)
6 - - -
7 VIDEOGRAPHER: We are back on
8 the record. The time is 1431 UTC time.

9 BY MS. VINCZE:

10 Q. Mr. Ghannam, did I understand
11 correctly you were saying the social status of
12 Mr. Al-Masri's family was also taken into
13 consideration in determining whether his
14 beneficiary would be eligible for payments?

15 A. Yes. Yes, the social status of the
16 beneficiaries or the family -- the social
17 status of the family is the one who determines
18 whether the beneficiaries are eligible for the
19 payment or not according to Division 24 of the
20 law.

21 Q. The beneficiary must also have a
22 family member that qualifies as a martyr
23 according to the Martyrs' Families and Injured
24 Care Establishment; correct?

25 A. Yes.

1 Q. By social status, do you mean
2 financial condition?

3 A. Yes, the financial condition of the
4 family.

5 Q. So if the family is affluent then
6 the beneficiary will not qualify for these
7 payments?

8 A. Yes, and as I mentioned, according
9 to Division 24 of the law it states if the
10 beneficiary doesn't have people who are in
11 need, the payments will be discontinued in
12 total.

13 Q. Are you aware of any instance in
14 which a martyr's family member was denied
15 benefits because the family was too wealthy?

16 A. These cases are within the
17 Establishment for the Wounded and Martyrs
18 Family Affairs, and as long as they were
19 denied, these cases were denied, it would not
20 come to the Ministry of Finance to dispense the
21 allocations.

22 Q. But you spoke to people from the
23 Martyrs' Families and Injured Care
24 Establishment in preparation for today's
25 deposition; correct?

1 A. Yes.

2 Q. And you did not learn whether it has
3 ever been the case that a family was
4 disqualified due to wealth?

5 A. I spoke with them and they explained
6 to me there are certain cases where the
7 beneficiaries were not eligible, and for that
8 reason the allocations were not dispensed for
9 the martyr's family.

10 Q. Did they explain what level of
11 wealth disqualifies a beneficiary from
12 receiving these payments?

13 A. The wealth that guarantees decent
14 living.

15 Q. And are there any regulations that
16 speak to that?

17 A. Has to be the capability of living a
18 decent life, and this is the main criteria or
19 standard as to having death of one of the
20 family members.

21 Q. What about the law that you
22 mentioned earlier, the 2016 law, does that
23 speak to the level of wealth that disqualifies
24 a family from receiving payments?

25 A. I mentioned before that Division 24

of the law explains obviously that the family has to be eligible or in need, and in Palestine state there is a poverty line. If the family is living below the poverty line they are eligible for the allocations. And if the family is living in the status where they are above the poverty line, they are not eligible for dispensing the allocation.

9 Q. Can you pull up tab 20, please

10 This is a document that we received I believe
11 this morning from Defendants. We would
12 designate this as Exhibit No. 13.

13 (Deposition Exhibit No. 13 was
14 marked for identification.)

15 BY MS. VINCZE:

16 Q. Mr. Ghannam, do you see this
17 document?

18 A. Yes.

19 Q. Do you recognize this document?

20 A. Yes.

21 Q. What is it?

22 A. This is law that governs the caring
23 of the families of the wounded and martyrs
24 inside the country, and it is worked on --
25 applied by the president on December 26 of

1 2016.

2 Q. Is this the law you referred to
3 earlier?

4 A. Yes.

5 Q. And you referred to it throughout
6 the deposition?

7 A. Yes.

8 Q. Can you please read me the text that
9 is beneath the emblem of the Palestinian
10 Authority at the top of the document?

11 A. The Minister's Committee.

12 Q. What is beneath that?

13 A. The law for taking care of the
14 families of the wounded and martyrs inside the
15 country.

16 MR. BALOUL: This is Gassan
17 Baloul, I'm trying to help you here. Your
18 question is clear. The translation was
19 inaccurate. You said the words under the
20 emblem; correct?

21 MS. VINCZE: Yes.

22 MR. BALOUL: The translation
23 was the word under State of Palestine. So
24 that's the confusion. If we could have the
25 interpreter say under the emblem and reask the

1 question, you'll get your answer.

2 MS. VINCZE: I'll reask the
3 question.

4 BY MS. VINCZE:

5 Q. Mr. Ghannam, can you please read me
6 the words that are beneath the emblem at the
7 top of the page.

8 A. Palestine State, Minister's
9 Committee, law governing taking care of the
10 families of the wounded and martyrs inside the
11 country for the year 2016.

12 Q. Is the Minister's Committee a
13 reference to the Palestinian Authority?

14 A. Yes.

15 Q. What does it say after the text you
16 last read me?

17 A. It's the governing law taking care
18 of the families of wounded and martyrs inside
19 the country for the year 2016.

20 Q. What does it say beneath that?

21 A. Below it says the president of
22 Palestine, the acting president of PLO.

23 Q. Mr. Ghannam, is there a blank on the
24 line where 2016 appears? There's a parentheses
25 and there's something, there's a blank there

1 between the parentheses.

2 A. Yes.

3 Q. Why?

4 A. When this law was submitted to the
5 president to implement it, it has to be
6 approved, and then after that a number will be
7 assigned to the law.

8 Q. So no number has been assigned to
9 this law?

10 A. Yes, later on after submitting it by
11 the president, a number will be added to this
12 law.

13 Q. So the president has not approved
14 the law yet?

15 A. Yes. The president has signed on
16 the law on December 26, 2016.

17 Q. But he has not formally approved it
18 yet?

19 A. Implementing it is the approval of
20 the law.

21 Q. It has not yet been implemented?

22 MR. BERGER: Objection,
23 misstates his testimony. Maybe you can avoid a
24 double negative and reask the question.

25 BY MS. VINCZE:

1 Q. It hasn't been implemented, has it?

2 A. Yes, it has been implemented.

3 Q. When was it implemented?

4 A. It was implemented on December 26,
5 2016, and it was approved since then.

6 Q. And is that shown anywhere on this
7 document?

8 A. Yes, it is.

9 Q. Where?

10 A. It is written this law will be
11 implemented, and then the signature of the
12 president, and the date is December 26, 2016.

13 Q. Where is that -- go ahead.

14 A. And this is the signature of the
15 president.

16 Q. Is that on the final page of this
17 document?

18 A. On the first page.

19 Q. Have you at any time referred to any
20 other law in your deposition today?

21 A. Yes. The financial rules and
22 regulations that preceded this law.

23 Q. What about yesterday, did you refer
24 to any other law yesterday?

25 MR. BERGER: Objection. The

1 transcript speaks for itself.

2 BY MS. VINCZE:

3 Q. You may answer, Mr. Ghannam.

4 A. No.

5 Q. Can you please page to page 11 of
6 the PDF. Thank you.

7 Mr. Ghannam, can you please read
8 what appears to be Section 39?

9 A. Yes, Section 39 states this law will
10 be presented with a decision, and the
11 implementing committee in the first round that
12 they sit to implement it, to approve it.

13 MR. BALOUL: Objection to the
14 translation. I'm happy if you want me to, I
15 can translate it for you or the interpreter can
16 try again.

17 MS. VINCZE: Mr. Baloul, would
18 you translate this for us, please.

19 MR. BALOUL: Sure. They're
20 referring to the legislative committee. It's
21 supposed to be presented to the legislative
22 committee at the first session.

23 MS. VINCZE: Thank you.

24 BY MS. VINCZE:

25 Q. What is the legislative committee?

1 A. The legislative committee is one of
2 the legislative entities that the members are
3 chosen by the public.

4 Q. Is it a legislative body?

5 A. It is the entity that approves all
6 the laws that is dispensed in Palestine.

7 Q. To your knowledge, has the
8 legislative committee approved this law as of
9 this date?

10 A. The legislative committee has not
11 held a session since 2008, and it gave the
12 authority to the president to within the
13 regulations, Palestinian regulations, to
14 discuss and approve the law. And once the
15 committee has a session again, they will
16 discuss the laws that are present to approve
17 them.

18 Q. Mr. Ghannam, you have -- pardon.
19 Withdraw the question.

20 Can you please take us to page 8 of
21 the PDF. This appears to have a subsection 24?

22 A. Yes.

23 Q. Mr. Ghannam, is this the subsection
24 24 that you have referred to throughout your
25 deposition?

1 A. No, that's Section 23, which
2 precedes Section 24.

3 Q. To clarify, you were referring to
4 Section 23 earlier?

5 A. Yes.

6 Q. Can you please read it for us.

7 A. The section states if the martyr did
8 not have beneficiaries who are eligible
9 pursuant to the divisions of the law then the
10 allocations will be discontinued completely.

11 Q. Can you read Section 24 as well,
12 please.

13 A. Section 24 states that the wounded
14 is considered in the following circumstances:

15 1. It has to be after treatment
16 from the wounds.

17 Section 2 states the disability
18 should be total and it's not less than 40
19 percent as a result of the injury.

20 3. If he obtains or sustains full
21 disability not less than 40 percent as a result
22 of the following injuries:

23 A. An eye injury that leads to the
24 extraction of the eye, or the complete loss of
25 sight in one of the eyes or both of them,

1 granted that the permanent disability will be
2 not less than 30 percent.

3 B. If the injury happens to the
4 kidney that leads to the extraction or the
5 dysfunction of one of the kidneys, granted that
6 the disability, the permanent disability will
7 be not less than 30 percent.

8 C. If the injury happens to the
9 genital tract and prevents the person from
10 reproduction, from normal reproduction, granted
11 that the permanent disability should be not
12 less than 30 percent.

13 MS. VINCZE: Let's take a
14 short break. Let's go off the record and take
15 a short break, please.

16 VIDEOGRAPHER: We are now off
17 the record. The time is 1505 UTC time.

18 - - -
19 (Whereupon, a short recess was
20 taken off the record.)

21 - - -
22 VIDEOGRAPHER: We are back on
23 the record. The time is 1508 UTC time.

24 MS. VINCZE: I have no more
25 questions at this time. Mr. Berger, Plaintiffs

1 in light of Mr. Ghannam's testimony request
2 Defendants produce all of the laws and
3 regulations Mr. Ghannam referred to during his
4 testimony today and yesterday, and we are
5 reserving our rights with respect to late
6 produced documents.

7 MR. BERGER: We will certainly
8 endeavor to produce all of the laws to you. I
9 think I've been clear with your colleagues in
10 other depositions, we don't believe there are
11 any late produced documents, so therefore no
12 rights to reserve. We don't need to use air
13 time for this now. So the deposition is
14 concluded subject to those reservations on your
15 side and our side.

18 (At 1509 UTC time, the
19 deposition was concluded. Signature was not
20 waived.)

	ERRATA SHEET		
	REASON FOR		
PAGE	LINE	CHANGE/CORRECTION	CHANGE/CORRECTION
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1 C E R T I F I C A T E
2 - - -
3

4 I, FARID GHANNAM, do hereby certify
5 that I have read the foregoing transcript and
6 it is a true and correct copy of my deposition,
7 except for the changes, if any, made by me on
the attached Deposition Correction Sheet.

8
9
10 FARID GHANNAM
11
12 Date
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July 30, 2021

1 COMMONWEALTH OF PENNSYLVANIA)
2) SS
COUNTY OF WASHINGTON)

3

4 CERTIFICATE

5 I, Kathy D. Landock, a Notary Public
6 in and for the Commonwealth of Pennsylvania, do
hereby certify that the witness, FARID GHANNAM,
was by me first duly sworn to testify the
truth, the whole truth, and nothing but the
truth; that the foregoing deposition was taken
at the time and place stated herein; and that
the said deposition was recorded
stenographically by me and then reduced to
typewriting under my direction, and constitutes
a true record of the testimony given by said
witness, all to the best of my skill and
ability.

12 I further certify that I am not a
relative, employee or attorney of any of the
13 parties, or a relative or employee of either
counsel, and that I am in no way interested
14 directly or indirectly in this action.

15 IN WITNESS WHEREOF, I have hereunto
set my hand and affixed my seal of office this
16 2nd day of August, 2021.

17 

18 Kathy D. Landock, Notary Public
Certified Realtime Reporter

20 My Commission Expires:
March 28, 2023

21

22

23

24

25

July 30, 2021

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